



March 10, 2025

VIA ECF & EMAIL

The Honorable John M. Younge
U.S. District Court for the Eastern District of Pennsylvania
Room 15613 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

**Re: *American Environmental Enterprises, Inc. v. Sternberg et al.*
USDC, ED PA, Civil No. 2022-cv-00688 (JMY)**

Dear Judge Younge:

This office represents Defendant Manfred Sternberg, Esquire. A final pretrial conference is scheduled before Your Honor on April 1, 2025. In the interest of efficiency, we write to request an adjournment.

There are several motions pending before Your Honor, including my client's motion for summary judgment. If successful, Mr. Sternberg's motion would result in a complete dismissal of all claims pending against him. As such, the outcome of these motions will dramatically impact the expected scope of trial including the pertinent exhibits, the witnesses, experts and nearly every other component of the trial.

That being the case, we request that the April 1 conference be adjourned until no earlier than 30-days after disposition of the pending motions. If it would be helpful, it is respectfully suggested that Your Honor schedule a case management conference for April 1 in place of the final pretrial conference.

I note that this office attempted to meet and confer on this point with counsel for the plaintiff without success. I called Mr. Lightman 4-5 times, and each of my many emails went unanswered.

Thank you for Your Honor's attention to this important matter.

Respectfully submitted,

/s/ Seth L. Laver

Seth L. Laver

SL.L:mg
8925\0007\50414520